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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91202079
Party	Defendant Chun-Leon Chen
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Submission	Other Motions/Papers
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Date	01/23/2012
Attachments	3803-46-OPP-APPLICANT-INITIAL-DISCLOSURES-ASFILED-JAN23-2012.pdf (4 pages)(68114 bytes)

UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD

SOLVAY S.A., : Opposition No. 91202079

Opposer :

: Serial No. 85/143,738

Chun-Leon Chen :

Applicant :

APPLICANT'S INITIAL DISCLOSURES

Applicant, Chun-Leon Chen, by and through its undersigned counsel, hereby provides the following initial disclosures pursuant to Rule 26 (a)(1) of the Federal Rules of Civil Procedure and Rule 2.120 of the Trademark Rules of Practice. Applicant's disclosures are preliminary and based upon an investigation conducted thus far. Applicant reserves the right to modify or supplement its disclosures as it deems necessary and will modify and supplement the disclosures, use documents not described herein, and rely on witnesses not identified herein, if necessary, based on its continuing investigation and discovery and as additional information becomes available.

Nothing in this statement shall be construed or deemed as an admission of the relevance of any information, testimony, documents or tangible things, to any facts or issues that are, or will be, disputed or contested in this litigation.

Applicant reserves the right to object to identification, disclosure or production of any information, testimony, documents or tangible things, on the basis of the

attorney-client privilege, attorney work-product immunity, or on any other basis permitted to be asserted by Applicant under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, or any other rules or law that may be applicable to this proceeding. Applicant's does not represent that it is identifying every witness, document, or tangible thing possibly relevant to this opposition proceeding. The disclosures made herein represent a good faith effort to identify information Applicant reasonably believes may be used to support Applicant's claims and defenses.

A. Provide the name and, if known, the address and telephone number of each individual likely to have discoverable information that you may use to support your claims or defenses, unless solely for impeachment, identifying the subjects of the information.

Applicant believes the following individuals are likely to have discoverable information that the Applicant may use to support its claims or defenses.

<u>Name</u>	<u>Address</u>	<u>Subject</u>
Chun-Leon Chen	6170 West Desert Inn Road Las Vegas, NV 89146	Information associated with Applicant's Response to the Notice of Opposition.

Applicant reserves the right to indicate further persons as the facts are developed during the proceeding. Opposing counsel will be immediately informed as to any further names.


B. Provide a copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that are in your possession, custody, or control and that you may use to support your claims or defenses, unless solely for impeachment.

Applicant believes the following categories of documents which are in its possession, custody or control are relevant to its claims:

1. Documents associated with Applicant's Response to the Notice of Opposition including all prior registrations.

Such documents will be maintained at the offices of Rosenberg, Klein & Lee, counsel for Applicant and/or 6170 West Desert Inn Road, Las Vegas, NV 89146.

Applicant reserves the right to supplement, amend, or modify this response as it identifies, through discovery in this action, additional such documents.

By: 
Morton J. Rosenberg
Registration #26,049
ROSENBERG, KLEIN & LEE
3458 Ellicott Center Drive
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Attorney for Applicant
Chun-Leon Chen

Dated: 

CERTIFICATE OF SERVICE

The undersigned Attorney hereby certifies that a copy of the foregoing Applicant's Initial Disclosures was served on the Opposer by mailing a true copy thereof by first class mail, postage prepaid to: Mark B. Harrison, Esquire, Venable LLP, P.O. Box 34385, Washington, DC 20043-9998 on this 23rd day of January 2012.


Morton J. Rosenberg, Esquire